

1 Q What was it that you understood that you would be  
2 asked to do if you took the job?

3 A At that time I was thinking that most of my job  
4 might be in terms of how technology would support the  
5 learning process of the students.

6 I was not interested of being an MIS, Manager of  
7 Information Systems. Because for an MIS position, you can  
8 get plenty of them out of the Department of Education that  
9 pays a lot.

10 Q Is that right?

11 A In terms of MIS, there are a lot of positions out  
12 of the government that are real better positions than being  
13 there. The only reason for being there instead of being  
14 somewhere else is the opportunity to bring new ideas to the  
15 table in terms of how technology can improve learning.

16 Q Now, before you took the job were you at all aware  
17 of what is known as the E-Rate Program?

18 A No.

19 Q You had even heard of it?

20 A I heard about the word "E-Rate Program" in the  
21 interview that it was mentioned. But the details of E-Rate I  
22 didn't get into it until after I was in the position.

23 Q So during the interview somebody mentioned the  
24 E-Rate Program to you?

25 A Yes, because I made a question of what's going on

1 with the position, which are the projects, which is the  
2 states of the projects. I made questions of is there  
3 anything I should know that is important in terms of  
4 considering the position.

5 Q Who provided you this information? Do you  
6 remember?

7 A I don't remember it, but I know that E-Rate was  
8 mentioned at that time because when I assumed the position I  
9 knew that E-Rate was a project that was going on.

10 Q At the time of the interview when you were  
11 considering the job, what other information were you given  
12 concerning the E-Rate Program here in Puerto Rico?

13 A At that time, I had information that there was  
14 supposed to be a project for connecting all schools in the  
15 web. At that time the name was Edu-Net or so and I was  
16 amazed about that.

17 Q You were?

18 A I was amazed about that.

19 Q About what?

20 A About that idea that all schools can be connected.

21 Q You thought it was a good idea?

22 A Yes.

23 Q But did you just hear about that project in your  
24 interview or had you heard that before?

25 A No. I had heard about the project before but I

1 didn't have the insights that the name was Edu-Net and that  
2 the funding was provided by E-Rate. I knew that later.

3 Q All right.

4 A That that was a good idea? Of course. Back in the  
5 early 1980's I myself made which was one of the first  
6 networks in a public school by some scrap computers we got  
7 from Colegio de Mayaguez. I bought the parts, I fixed the  
8 computers, I made the net and we had a computer lab in the  
9 Las Mariás High School a long time before it was even thought  
10 to do that in the Department of Education, so I was one of  
11 the people that was thinking about that as early as the late  
12 '70s or early 80's.

13 I even put all my knowledge I had at that time and  
14 even my money to fix the things, to make it work and it did  
15 work. So I have said that if I did that with some scraps of  
16 computers from the Colegio de Mayaguez that were for  
17 disposal, think of what we can do with a whole project for  
18 the public schools in Puerto Rico. It was like "hey kid, you  
19 want some candies?" Of course I do.

20 Q Who did you understand would be the person that you  
21 reported to if you took the job?

22 A I was told at that time that this position reported  
23 directly to the Secretary of Education and most of the  
24 reporting I did it to José Santana or to Dra. Collazo.

25 Q What was her first name?

1           A     José Santana and Dra. Collazo, Carmen Collazo.  
2     Because Santana was the Special Aid in the technology area.

3           Q     And who was Dra. Carmen Collazo?

4           A     She is the Associate Secretary for the Department  
5     of Education.

6           Q     So you did not report directly to Mr. Rey  
7     Hernández?

8           A     Most of the time. But every day transmittals, most  
9     of the time it was easier to give it to José or take it to  
10    Dra. Collazo and they would make the whole proceeding of  
11    trying to get it to the Secretary, but if it was real  
12    important, he had a meeting with us and at times with me and  
13    he asked me for the information. I gave him the information  
14    but most of the times he was a busy Secretary.

15          Q     Who was Adonay Ramírez?

16          A     Adonay Ramírez was a consultant that was hired by  
17    our office to help us in terms of managing the project of E-  
18    Rate. It was such a big project that we needed somebody to  
19    be directly in charge.

20          Q     Was he hired before you started working there?

21          A     He was hired after I arrived. I think a month  
22    later or so but he was being considered before I arrived.

23          Q     Who would think about the need to hire somebody to  
24    help manage the E-Rate Program specifically?

25          A     That happened before I was interviewed, so what I

1

2

J

1

1

**\_\_\_\_\_**

\_\_\_\_\_

**Abstract**

1

**2019-2020**

1

1

1

1

1

1

### References

**1**

1

**1. Study the following passage and answer the questions that follow.**

1 am going to tell you is my opinion. My personal opinion of  
2 why I think it might happened.

3 Q Okay.

4 A I think that the Department of Education had such a  
5 huge project that they needed specialized resources specially  
6 in terms of project management to over look what was going on  
7 with that project.

8 MR. A.J. BENNAZAR: Oversee.

9 BY MR. CAMILO SALAS:

10 A (DEPONENT) Oversee that project and as far as I  
11 know, Mr. Ramirez is very professional with a lot of  
12 knowledge. He had the experience. He was one of the  
13 designers of the first networks in the Department of  
14 Education sometime ago and he had the experience and as far  
15 as I know and my experience with him is he was real good for  
16 me in terms of the information and the services that I got  
17 from his performance while I was in the project.

18 Q Are you talking about the E-Rate?

19 A Yes, in terms of the E-Rate. Because physically it  
20 wouldn't be possible for the Director of OSIATD to overlook  
21 that project and conduct all the other projects that were  
22 going into technology.

23 Q So it would have been impossible for you once you  
24 took the job to oversee that E-Rate Project?

25 A Absolutely. Just consider that that E-Rate Project

1 was assigned to every single school in Puerto Rico. I mean,  
2 public schools and at that time it was like 1,470 schools or  
3 something like that and it was a build-up that had to be  
4 tested and retested and we were accountable to check out that  
5 everything was going the way it should be. So it takes so  
6 much time and effort, that the Director of the Office be  
7 directly in charge of the micro management of the project.  
8 Otherwise, it would be impossible.

9 Q So Mr. Ramírez was hired to do that micro  
10 management of the project, right?

11 A Yes.

12 Q And he reported to you or to someone else?

13 A The results of his work, and I won't say the total  
14 because I can't say it, I don't know. But all the results  
15 that I wanted from the E-Rate Project I asked him.

16 Q What did you mean by "all the results you asked  
17 him?"

18 A Facts, reports, assessments, information and  
19 instructions on how... First on instructions, consulting  
20 with him. How do you think we would work this and that and  
21 what the results might be taking into consideration what you  
22 are seeing and it was done through him.

23 Q It was what?

24 A Done, performed through his services.

25 Q Did he have other people helping him with that or

1 he was doing that by himself?

2 A He started doing the whole thing but we couldn't  
3 provide quickly as needed all the resources, so he was asking  
4 and asking "I need help, I need help" so I think it was in  
5 the second contract or the contract was nullified in order  
6 that he could bring somebody that we can hire at that time  
7 and help in. Specially in terms of the everyday work. Not  
8 the high decisions, but in the everyday work.

9 Q When you say "contract", that means a contract of  
10 Mr. Ramírez with the Department of Education?

11 A An extension of his contract so he could bring  
12 somebody within his same contract and work with him.

13 Q In terms of putting a date to what is going on, he  
14 came to work basically a month after you took the job. So he  
15 would have come basically about July of 2001, right?

16 A Yes.

17 Q And he was doing this job by himself until  
18 approximately when? How long?

19 A I think it was approximately after the big effort  
20 we had in that semester. I think either it was at the end of  
21 the semester or the beginning of the other. I am not that  
22 sure about that.

23 Q So towards the end of 2001 or the earlier part of  
24 2002?

25 A It might be either somewhere by the end of 2001 and



1 maybe the beginning or the renewal of the contract. His  
2 contract was renewed in the summer.

3 Q So his first contract would have taken from July 1,  
4 when he first came?

5 A Until June of 2002. What I am not sure of, because  
6 there were so many things happening is that I am not sure of  
7 the detail of when he got help.

8 Q I understand.

9 A I am sure that he asked me about the modification  
10 of the contract. What I don't remember is if it was the  
11 actual contract that was running at that time. I think that  
12 the Department of Education at that time was not allowing to  
13 do that, so I think that he had to wait until the end of the  
14 contract so that for the new contract of his second year,  
15 when I was in there, was that he was allowed to include in  
16 the new contract that he could have somebody to help him.

17 Q And the second contract for him would have started  
18 in the summer of 2002?

19 A It was always in the summer because it is the end  
20 of the fiscal year.

21 Q I understand that you are trying to recollect this  
22 from memory, but we can say basically that at least as you  
23 remember today from the time that he came on board on about  
24 July of 2001 until the summer of 2002, he was doing the job  
25 by himself.

1           A       Yes. He was using part of the resources we had.  
2       We had scarce resources but I remember because some of the  
3       time he was "hey Aníbal, I need some people to go here and go  
4       there. How can I do it?" So I had to negotiate with Juan  
5       Carlos Sierra that was managing the progress "I need people  
6       from your people to help on the line.

7           And also, I remember that was one time when we made a  
8       request to "Oficina de Gerencia y Presupuesto" so they can  
9       manage to help me with, I think the request was for 300  
10      admissions throughout the government because in a specific  
11      moment I wanted to make an assessment throughout all the  
12      schools in Puerto Rico and the only way I can do it because  
13      we don't have the resources to do such a task, was asking OGP  
14      to coordinate to help these people move on  
15      with---

16           MR. A.J. BENNAZAR: For the record, may I suggest  
17      that we translate "OGP Oficina de Gerencia y Presupuesto" as  
18      the Office of---

19           MR. CAMILO SALAS: It's a proper name. I knew that  
20      in Spanish. It is the Office of Management and Budget.

21           MR. A.J. BENNAZAR: Of the Commonwealth of Puerto  
22      Rico.

23           MR. CAMILO SALAS: But since it's a proper name and  
24      you can leave it in Spanish.

25           MR. A.J. BENNAZAR: Okay.

1 BY MR. CAMILO SALAS:

2 Q So at one point you asked the OGP for about 300  
3 people?

4 A Yes. My first idea was to find 500. That's the  
5 people I need, but one thing is what you need and another  
6 thing is what you can get. So we started downsizing and I  
7 made a request for 300 and we finally got some 200 people.

8 Q And when was it that you made that request for 500  
9 people about?

10 A I started talking about that by I think it was the  
11 end of September. I started talking with my staff that I  
12 needed to do such an assessment and we started talking about  
13 that.

14 Q Of which year?

15 A 2001.

16 Q When you first got there?

17 A Yes.

18 Q And who was your staff you were telling me?

19 A The staff were the leaders of the projects that  
20 were going on.

21 Q Okay.

22 A That I had at that time Juan Carlos Sierra who was  
23 on the help desk.

24 Q He was on which program?

25 A Help desk and I had Armando González that was in

1 the Computer Center. I had Madeline Zayas that was the  
2 Director of the "Oficina de Apoyo Tecnológico a la Docencia".  
3 I had Alba Bermúdez, Adonay, Arnaldo Ramos, José, that was  
4 the Special Aid to the Secretary in that area.

5 Q José? What is his last name?

6 A Santana. We started talking about that I had that  
7 idea. I think it was good so I brought it to the staff and  
8 we discussed it with the staff and after that we talked that  
9 with Dra. Collazo and she said it was okay and we go ahead.

10 So we let know the Secretary what we had. You  
11 know, he is the head of the Department so since its going to  
12 be a transaction between department and department and it has  
13 to be also...

14 I think we made a letter. When I say "we" I mean  
15 the Department of Education. The Department of Education  
16 made a letter to the "Oficina de la Gobernación" to let them  
17 know that we are needing all this collaboration from other  
18 agencies and at that time I had talked with Bene Díaz (sic)  
19 from OGP. I had already talked with him. I explained my  
20 idea and he said "it looks okay for me" I just let them know  
21 that we are going to need some sort of collaboration.

22 It was handled through the "Oficina de la  
23 Gobernación" or something like that and we started making  
24 arrangements for that assessment as I may say, it was mid  
25 October or something like that. Finally, the assessment was

1 done. That assessment.

2 Q When was it done?

3 A I think it was early in 2002.

4 Q Early you mean in---

5 A In the beginning of the year.

6 Q January, February?

7 A It should be somewhere... Of course, it wasn't in  
8 the first 15 days because schools were closed. So that means  
9 that it... I don't have the exact date because I don't have  
10 any of the data with me but it should be somewhere between  
11 the beginning of the school year and early February because  
12 we had to wait until the schools were opened that the  
13 technicians from the departments from the different offices  
14 of the government were back in business, settle their job and  
15 they have the time.

16 We trained them on what we were going to be doing  
17 for 2 days into the different jobs and then we send them to  
18 the schools. So I think it should have been by I say, the  
19 end of January or the beginning of February. Somewhere  
20 around that date. But that was a second assessment. We made  
21 some assessments before. We started making assessments in as  
22 early as the end of July. With the first connections I  
23 tried, I started making assessments.

24 Q With the first connections you tried?

25 A Yes, connections. Connecting schools into the net.

1 Q I don't understand.

2 A Okay. I was told when I arrived to the position,  
3 that in terms of this specific project that the project was  
4 going on. That schools were supposedly disconnected and that  
5 they were not connected so the first thing that I do with  
6 that is get an idea of which were connected and which were  
7 not.

8 When I arrived for the position there was not  
9 information at all. I couldn't make any contact with Mr.  
10 Peguero, so all the information I had was for every  
11 connection that was collected by Arnaldo Ramos and José  
12 Santana. At the time, the information I had was that the  
13 schools were relatively ready to be connected so I had the  
14 plan and we started making connections of what I called  
15 "V-1." That is the first generation. "V" is for validation.

16 I was trying to validate everything, so we selected  
17 schools all around the Island that included all kind of  
18 situations. We wanted small towns, big cities, even  
19 overseas. I mean, we selected Vieques who was on the other  
20 side of the sea. So I wanted to see if that situation of not  
21 being part of the main island was working so we selected  
22 Vieques, as I told you. Also big cities, small towns, in the  
23 high lands, in the coast. A sample of every kind of school  
24 that might be going on and trying to connect them. We  
25 started to do such a job in July so when the new school year

1 started, we can have an idea of what is going on.

2 Q You were doing that yourself or---

3 A No. At that time the suppliers at that time were  
4 in charge of doing so.

5 Q First of all---

6 A I visited myself some of the schools in that July  
7 to see what was going on. I wanted to see it by myself what  
8 was going on with the infrastructure, the equipments, the  
9 state of whatever was done. But in the every day, of course  
10 I was not there. I saw many things going on. E-Rate was one  
11 of the projects. A very important project but it was not the  
12 only one I was managing at that time and Adonay Ramirez at  
13 that time was there.

14 Q So that would have been about the time when Mr.  
15 Ramirez first came, right?

16 A Yes.

17 Q It says here, I think you have told me that you  
18 first started making assessments about the end of July.

19 A Yes. The way I worked is project management.  
20 Every project has to have a product.

21 Q Has to have a what?

22 A Every project as an outcome, has to have a product.  
23 An accessible product that can tell me if the task was done,  
24 if it was performed and to which degree it is performed  
25 because I am accountable for that.

1           So everything I do, even products, I do it within  
2     the terms of project management and of course thinking that  
3     way, one of the first things that strike me in the face when  
4     I arrived to the position is "hey, I don't have any data that  
5     supports what is suppose to be here." I don't know if  
6     whether it was produced or it was not. I am just saying that  
7     I don't have it. So the first thing I...

8           I remember these words I said to the people in the  
9     first meetings we had "If I don't see it, it doesn't exist".  
10    So I was clear on that and I was consistently telling the  
11    people "I need evidence." "Give me evidence."

12           So, the first thing I started doing with this and  
13    with all the other projects I was ever given was "okay, let's  
14    produce evidence, specially if the state corridor is the  
15    Federal Government."

16           Q     So basically you started doing assessments because  
17    you first got on this job and you wanted to see what was  
18    there?

19           A     Basically you will see that in the reports I made  
20    at that time I called this first generation school V-1,  
21    Validation 1. In my schedule I had and I tried to make my  
22    best recollection, that I have I think at that time it was  
23    running in 3 or 4 generations. V-1 through V-3 or V-4. That  
24    was something I was planning to spread. The connection. The  
25    continuity throughout the Island.



1           At that time one of the thoughts that guided me in  
2 doing this is that first I want to check the situation in  
3 infrastructure of the schools, of the suppliers, of buyers,  
4 everything throughout the Island that can support this  
5 project and another thing that was very important for me is I  
6 want to have a sample of what technology means to all the  
7 sectors in Puerto Rico because I believe in technology and I  
8 want teachers and students and parents and the communities to  
9 have a taste of it so at the time I was not thinking of which  
10 is the best place to make it in other terms that were "let's  
11 have people have a sample of technology."

12           That at least every single school district or town  
13 in Puerto Rico have one taste that technology is available.  
14 That there is connectivity through the E-Rate Project so I  
15 don't have to send anybody to say, go to San Juan, go to  
16 Ponce, go to somewhere else to see technology. You have one  
17 center. At least one center in your town that you can go and  
18 see and you can imitate. That you can learn from whatever  
19 they are doing.

20           So we started making this generation V-1, V-2, V-3  
21 and V-4 so they can spread and I even remember that I made a  
22 map in which I use to mark spots. That is very easy in terms  
23 of your sight, the use of a map and because of the yellow  
24 spots or green spots or whichever spots I used the dots on, I  
25 knew if it was spreading and where the disconnections are

1 occurring because I am from a small town and I remember when  
2 I was a kid, Las Marias was one of the last towns to see  
3 improvement and technology and all the things that were  
4 supposed to be.

5 So I want to make sure that kids in schools like  
6 Las Marias and like Maraca and Jayuya and all those people in  
7 "barriadas" in the big cities are not going to pass through  
8 the same things I passed. I just wanted to make sure there  
9 was an equitable way that everybody would have a taste of  
10 what technology is and we started making assessments on that.

11 That first time of assessments was to the best of  
12 my thoughts, was if the connectivity was acquired when we try  
13 to make it, if the schools have the cuadrants (sic) to do  
14 such a connection and the stability of the connection, is  
15 that I want to make sure that I would not connect in the  
16 morning and it would be disconnected in the afternoon. So  
17 the first things that were easy ones, is that I better be  
18 sure what was going on and I was looking before we started  
19 the second generation in V-2, how it was performing for a  
20 month this  
21 V-1 generation.

22 At that time if I was told that everything was  
23 ready, I started my planning on that. I didn't have any  
24 other evidence that they say that everything is all right so  
25 as soon as I have validated the first generation, I will go

1 for the second one. As soon as I had the second one, I would  
2 go for the third one. It was on a stage process.

3 The first part of this V-1, schools were physically  
4 connected. Then, when the second generation were going to be  
5 physically connected, then I am going to work with some other  
6 things in another concern to validate this first generation  
7 so I can try with this first generation whatever I am going  
8 to be doing in a phase manner. Some sort of a step building  
9 up, building up. Whatever I am going to be doing with  
10 second, third or fourth generation, I am testing it with the  
11 first and that is the way we started documenting the whole  
12 thing.

13 Q You started the assessment not because there were  
14 any report problems. You started it because you wanted to  
15 see what was there and how you were going to implement this  
16 plan that you had formulated in yourself about how to go  
17 about it?

18 A That is the way I worked.

19 Q Right. The first assessment was not in response to  
20 any reports of problems or anything like that.

21 A At that time?

22 Q Yes.

23 A July?

24 Q Yes.

25 A No.

1 Q All right.

2 A I knew at the time that there were no schools  
3 connected. Why? I don't know. I had no schools connected  
4 at all but I had been told that everything was ready so if  
5 everything was ready, let's go connect it.

6 Q You knew that no schools were connected?

7 A I was told.

8 Q You were told that no schools were connected?

9 A No schools were connected.

10 Q Who told you that?

11 A I think it should be... That's a question I should  
12 asked either in the interview or the first 1 or 2 or 3 days  
13 at the position.

14 Q How---

15 A It had to be the people that were receiving me at  
16 the time who were José Santana and Arnaldo Ramos and the  
17 staff that ran the office at that time. It was the office  
18 that existed even though I was not there.

19 Q When you said that no schools were connected, what  
20 did you mean by that?

21 A I had to establish the connected schools.  
22 According to the Education, it's a school where a station,  
23 some sort of a station, a PC can connect to the Internet  
24 through the infrastructure provided by the project and to be  
25 sure that I wasn't wrong, then I consulted with the people in

1 USAC and they told me "you are right, that is a connected  
2 school." Sooner or later USAC is the first step in my stage  
3 to the Internet.

4 Q I am a little confused because you said that some  
5 people told you that no schools were connected but you also  
6 tell me that your staff told you that were ready to be  
7 connected.

8 A Yes, and the providers told me we are ready.

9 Q Who told you that "we are ready"?

10 A I should have... I don't remember the people  
11 exactly but exactly from both providers I had at that time  
12 should tell me that everything was all right because they  
13 move out with the people from my office to make connections  
14 there and everything was supposed to be ready.

15 At the time I think that PRT, the current Manager  
16 from PRT was Arnaldo Díaz and from DRC was the guy with the  
17 flap top, Juan Carlos.

18 Q All right. The 2 providers were PRT and DRC?

19 A Yes.

20 Q That's what you are talking about?

21 A Um-jum.

22 Q All right. Now, let me get something clear. You  
23 are telling me that the people in your staff told you that  
24 the schools are not connected?

25 A Right.

1 Q But you are also telling me that the people of PRT  
2 and DRC told you that the schools are ready to be connected?

3 A Yes.

4 Q Now as I understand your testimony, "connected" to  
5 you means the complete system is in place. Meaning  
6 computers, T-1 lines, electricity in the schools and  
7 everything that would allow a person to sit at a desk with a  
8 computer and be able  
9 to---

10 A At least.

11 Q At least?

12 A Reach the Internet.

13 Q All right, reach the Internet. Now did you at any  
14 time during that period of time, ask anybody which entity was  
15 supposed to provide those computers which would be an  
16 integral part of the station that would allow a person to  
17 connect to the Internet?

18 A Say it again?

19 Q If I understand you correctly, your staff told you  
20 that the schools were not connected, right?

21 A Um-hum.

22 Q And to be connected you would need a computer,  
23 would you not?

24 A There is supposed to be a computer.

25 Q Right. Who was supposed to provide the computer?

1 A The Department of Education.

2 Q Did you ask in the Department of Education if all  
3 the computers had been provided?

4 A Yes.

5 Q And what did they tell you?

6 A There were computers over there.

7 Q Who did you ask?

8 A I asked the first 2 contacts I had.

9 Q I'm sorry?

10 A The first 2 contacts I had even in the interviews  
11 that were José Santana and Arnaldo Ramos. They were the  
12 people that were running the office before I was in the  
13 position. Whatever was done from January to June, they were  
14 the ones to know so they were logically the people that I  
15 were going to be asking what is going on.

16 Q Um-jum.

17 A And they gave me their feedback and also the  
18 technicians and the people in charge of the project that I  
19 have in the office.

20 At the time, the people from the "Centro de  
21 Cómputos" and Juan Carlos Sierra was in charge of the front  
22 desk and distribution of the computers. I think that the  
23 only people I didn't ask an opinion to were the janitors  
24 because they weren't part of the office but I heard everybody  
25 that had something to say. I would discriminate whatever I

1 heard but I listened to everybody that let me know what's  
2 going on.

3 Q So you were told then by your staff, except the  
4 janitors of course, that in July of 2001 the Department of  
5 Education had purchased and installed all the computers that  
6 the Department of Education was required to provide at this  
7 compliment to the E-Rate Program?

8 A No, Sir.

9 Q Okay. Well what was it that they told you?

10 A At the time I asked are the schools connected.

11 Q Well, each connected means?

12 A Connected means that the computers are at the  
13 schools even though the servers, there are suppose to be 4  
14 servers operating on each school.

15 Q Um-jum.

16 A At least the servers should reach the Internet from  
17 the school so I consider it to be connected.

18 Q I thought you told me that you considered to be  
19 connected meaning that there is a computer where somebody can  
20 sit down and log in into the Internet, right?

21 A Um-jum.

22 Q If you don't have a computer you can't log in.

23 A Yes, but I have 4 servers. If a server can reach,  
24 then a computer should be able to reach.

25 Q Right. We clarified that and you asked whether or



1 not the schools are connected. I thought you told me earlier  
2 that connected meant all the equipment including not only the  
3 servers but also a computer.

4 A No, no, no, no, no. I meant that any PC that can  
5 be a stand alone computer from somebody or the server can  
6 reach the Internet if even the servers have connection.

7 To reach the Internet there is no reason for any  
8 computer connected on that web to reach the Internet and the  
9 information I have is that not even the servers were  
10 connected to the Internet.

11 Q And who told you that?

12 A The people. The technicians I had.

13 Q Everybody except the janitors?

14 A Um-jum.

15 Q They told you that---

16 A In the Department of Education.

17 Q And the Department of Education told you that the  
18 servers were not connected.

19 A That there were no schools connected at that time.

20 Q I have a problem with this word "connected" because  
21 what does it mean?

22 A It means that a computer---

23 Q A what?

24 A A computer.

25 Q Um-jum.

1           A     A PC can connect from the school at the other end  
2 of the web---

3           Q     At the school.

4           A     And the school can reach through the infrastructure  
5 provided by the project to the Internet.

6           Q     Okay. Now, if there were no computers in the  
7 school---

8           A     At least the server should be able to connect.

9           Q     And who had gone to all the schools to check every  
10 drop with a computer to see if there was a connection?

11          A     I didn't have the resources to do such a thing so  
12 that is why we selected some 30 or... Actually, V-1 went up  
13 to I think to 50 or something like that. I don't have the  
14 figures. The Department of Education should have that  
15 information. Since I can't do the whole system at the time,  
16 we selected those schools to make a test.

17          Q     Which were how many schools?

18          A     I think it should be somewhere around 50 with that  
19 first generation.

20          Q     Let me get something straight then. In July of  
21 2001, isn't it true that the Department of Education had not  
22 purchased the computers for each of the stations for each of  
23 the drops?

24          A     The information I had at that time was that there  
25 were all the computers in the schools but that doesn't mean